

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

SKYLAR WILLIAMS, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

GALDERMA LABORATORIES, L.P.,

Defendant.

Case No. 1:24-cv-02222

Hon. Lindsay C. Jenkins

**JOINT MOTION TO STAY DISCOVERY PENDING SETTLEMENT**

Plaintiff Skylar Williams and Defendant Galderma Laboratories, L.P. (collectively, the “Parties”) hereby jointly and respectfully move the Court to stay discovery pending the Parties’ finalization of a settlement agreement and filing of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement. In support of this Motion, the Parties state as follows:

WHEREAS, the Court ordered on September 18, 2025 (ECF No. 64) that:

1. Plaintiff’s expert disclosures, other than any related to testing, are due by September 22, 2025;
2. Plaintiff’s expert disclosures related to testing are due by November 15, 2025 (previous date September 2, 2025);
3. Defendant’s deadline to depose Plaintiff’s experts, other than any related to testing, is November 3, 2025
4. Defendant’s deadline to depose Plaintiff’s experts related to testing is January 7, 2026 (previous date November 3, 2025).
5. Defendant’s expert disclosures are due by January 20, 2026 (previous date December 22, 2025);
6. The deadline for Plaintiff to depose Defendant’s experts is February 20, 2026; and
7. The parties shall file a status report as to the progress of expert discovery by February 3, 2026;

WHEREAS, the Parties have agreed in principle to a class-wide settlement;

WHEREAS, the Parties believe that it is in the interest of judicial economy to stay

discovery pending the finalization of the settlement agreement and filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

**WHEREFORE**, the Parties respectfully request that the Court enter an order that:

1. All discovery deadlines are hereby stayed pending the filing of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

Respectfully submitted,

Dated: November 3, 2025

By: /s/ Matthew A. Girardi  
Matthew A. Girardi

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Dated: November 3, 2025

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